

Document Log Item

Addressing			
From		To	
Carl Goldstein/R9/USEPA/US		"Steven Costa" <glatzeldacosta@suddenlink.net> "Steven Costa" <glatzeldacosta@suddenlink.net>	
CC		BCC	
"Jim Cox" <jcox@cosintl.com> "Joe Carney" <Joe.Carney@delmonte.com> "Karen Glatzel" <kargatgdc@suddenlink.net> "Samual Augspurger" <saugspurger@sampac.com> "Tim Ruby" <Tim.Ruby@delmonte.com> "Matt Vojik" <vojik.matt@gmail.com>			
Description			Form Used: Reply
Subject		Date/Time	
Re: Emailing: gdc to EPA Sept 2008 Bioassay Testing.pdf, gdc to EPA- Error in Permit Bioassay Calcs.pdf		10/29/2008 04:55 PM	
# of Attachments	Total Bytes	NPM	Contributor
2	190,337		Marcela VonVacano
Processing			
Comments			

Body

Document Body

Steve,

Regarding the two (2) letters concerning the bioassay testing for the canneries JCO:

1. Your request to utilize a bioassay test, conducted in conformance with EPA Toxicity testing procedures and protocol in May 2008, is approved for use to meet NPDES permit semi-annual reporting requirements.

2. I have sent your letter concerning the calculation error you have uncovered to my Permits office (who wrote the permit) for their comment. In the meanwhile, for NPDES permit reporting, please use the following language for Part V.D.5.a.

"If during range finding testing in years one through three, one test result is found to be greater than 313 TUC (during the semi-annual reporting period) or an NOEC of 0.319 percent effluent (which is based on a maximum allowable dilution of 313:1 estimated at the ZID), the permittee is required to perform accelerated toxicity testing."

Please retain this email for your official NPDES permit records.

Sincerely,

Carl L. Goldstein
Program Manager
Pacific Islands Office
USEPA, Region 9
75 Hawthorne St.
San Francisco, CA 94105
(415)972-3767; fax(415)947-3560
email: goldstein.carl@epa.gov
"Steven Costa" <glatzeldacosta@suddenlink.net>

"Steven Costa"
<glatzeldacosta@suddenlink.net>

09/29/2008 12:10 PM

Please respond to "Steven Costa" <glatzeldacosta@suddenlink.net>
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To: Carl Goldstein/R9/USEPA/US@EPA
cc: "Joe Carney" <Joe.Carney@delmonte.com>, "Tim Ruby" <Tim.Ruby@delmonte.com>, "Jim Cox" <jcox@cosintl.com>, "Samual Augspurger" <saugspurger@sampac.com>, "Matt Vojik" <vojik.matt@gmail.com>, "Karen Glatzel" <kargatgdc@suddenlink.net>

Subject: Emailing: gdc to EPA Sept 2008 Bioassay Testing.pdf, gdc to EPA- Error in Permit Bioassay Calcs.pdf

Carl,

Attached are two letters concerning the bioassay testing for the canneries JCO:

[1] The tradewind season chronic bioassay test busted because the urchins were not "cooperative". The lab tells me that they will not have good organisms available until after November 1. Looking at our schedule, even if we completely miss this test we will still have six tests within the first three years of the permit, because we did an extra test last May. (Assuming we have no more busts). Therefore, we are requesting that we not go back to repeat this test, but count the May test as satisfying the permit requirements.

[2] We discovered what we believe to be a calculation error in the permit. The trigger point for chronic toxicity testing should be 313 TUC and not 256 TUC for the first three years.

Give us a call to discuss either of these issues when you get a chance



Steve and Karen gdc to EPA Sept 2008 Bioassay Testing.pdf gdc to EPA- Error in Permit Bioassay Calcs.pdf